

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

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JUN 25 1996

Federal Communications Commission
Office of Secretary

In the Matter of)
)
Amendment of Part 73 of)
the Commission's Rules to More)
Effectively Resolve Broadcast Blanketing)
Interference, including Interference to)
Consumer Electronics and Other)
Communications Devices)

MM Docket No. 96-62

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COMMENTS OF LUCENT TECHNOLOGIES INC.

Pursuant to Section 1.415 of the Commission's Rules, and the Notice of Proposed Rulemaking ("NPRM"), FCC 96-124, released April 26, 1996, Lucent Technologies Inc. ("Lucent") respectfully submits these comments on the Commission's proposal to amend its blanketing interference rules. One of the issues addressed in the NPRM is telephone interference.¹ The Commission observes that telephone interference is a rapidly growing concern, generating approximately 25,000 complaints per year from individuals to the Commission, and requests comments on questions related to telephone interference. NPRM Para 24. Lucent is a manufacturer and seller of a broad array of customer premises equipment ("CPE") that ranges from simple single-line residential telephones to large and complex business communications systems.

Specifically, the Commission seeks comment about the need for a rulemaking to establish radio frequency immunity standards for telephones and about the

¹ The term "telephone interference" is used in the NPRM to describe the ability of a nearby radio transmitter to interfere with the operation of a telephone. NPRM, Para. 22 and 23.

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appropriate role of broadcasters in resolving specific instances of telephone interference. Lucent's comments will address the voluntary efforts of telephone equipment manufacturers to mitigate telephone interference and will recommend increased involvement by broadcasters in resolving specific instances of telephone interference.

Lucent is interested in enhancing the satisfaction of customers with its products by addressing radio frequency interference to telephones. As a member of the User Premises Equipment Division of the Telecommunications Industry Association ("TIA"), Lucent participated in the recent development by the TIA, in conjunction with the Electronic Industries Association ("EIA"), of TIA Standard 631, "Telecommunications Telephone Terminal Equipment: Radio Frequency Immunity Requirements for Equipment Having an Acoustical Output" ("TIA-631"). Telephones complying with TIA-631 should be immune to interference over much of the blanketing area defined in the notice.² Lucent believes that the voluntary approach to mitigating the susceptibility of telephones to radio frequency interference represented by the adoption of this standard is responsible and appropriate. Thus, manufacturers of telephones that comply with TIA-631 will contribute significantly to the reduction of telephone interference.

With respect to whether the Commission should continue to rely on voluntary industry efforts to implement interference-free telephone design standards, Lucent believes that the recent adoption of TIA-631 represents a responsible voluntary

² As defined in the NPRM, a blanketing area "is the area in the immediate vicinity of a broadcast station where the signal of that station is so strong that it interferes with reception of other stations irrespective of the stations' frequencies. NPRM, fn. 3.

effort by telephone manufacturers to resolve telephone interference affecting their customers. In the absence of any indication that relying on such voluntary standards will serve the public poorly, there is no reason for the Commission to expend the resources of the Commission and the industry in developing mandatory standards. At a minimum, the Commission should give manufacturers a reasonable opportunity to incorporate this standard in their product designs before taking any further steps to develop a mandatory standard. At the most, the Commission should monitor the extent to which product designs for new telephone equipment products comply with TIA-631 or other similar standards.³

With respect to the responsibility of broadcast licensees to resolve telephone interference,⁴ NPRM, Para. 24, Lucent believes that, for telephones complying with TIA-631, a greater role for broadcasters would be appropriate. The Commission should require broadcasters to be responsible for resolving telephone interference complaints within the first year of a station's operation on the same basis that they are responsible for resolving interference complaints for affected devices that are currently afforded protection from blanketing interference by the Commission's rules.

³ Such information, when combined with data regarding telephone interference complaints received by the Commission and an updated "Telephone Interference Survey" reflecting an analysis of a sample of those complaints, would inform the Commission and the telecommunications equipment manufacturing industry about the extent to which a voluntary telephone interference standard -- TIA-631 or a similar one -- has been implemented and contributed to a reduction in the volume of telephone interference.

⁴ Generally, under the Commission's current rules, broadcast licensees are financially responsible for resolving interference complaints within the station's first year of test authority where the affected device is located within the station's blanketing area and the affected device is not excluded from protection. After the first year, the broadcaster must provide technical assistance and advice, but is not financially responsible for resolving the interference complaint. Currently, telephones are excluded from protection under the Commission's rules. NPRM, Para. 16 and 22.

For telephone interference complaints involving telephones not complying with TIA-631, a lesser degree of broadcaster responsibility would be appropriate. In this case, the Commission should require broadcasters to furnish technical information to assist telephone users in resolving the interference issue to the extent that they have helpful technical information readily available. Broadcasters would not, however, be financially responsible for the resolution. This obligation would include providing technical information about the source of the radio frequency interference and the selection of radio frequency filters or other technical solutions that could resolve the user's telephone interference problem. Broadcasters have readily available specific information about the nature of their radio signals and, thus, are more readily able than manufacturers to provide users experiencing telephone interference with helpful technical information about solutions to interference caused by their specific signals.

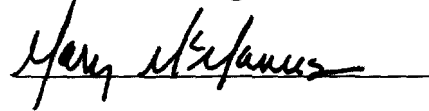
The approach outlined above engages both broadcasters and manufacturers of telephone equipment in the task of resolving users' problems with telephone interference. Telephone equipment manufacturers are encouraged to improve the immunity of their products to radio frequency interference by adopting TIA-631 or similar standard. Broadcasters would be obliged to provide their resources and knowledge to resolving what is expected to be a relatively small number of particularly difficult situations of telephone interference in spite of the fact that the telephone involved complies with TIA-631. In addition, broadcasters would be required to provide readily available technical information about potential solutions to telephone interference resulting from their particular broadcast signals.

CONCLUSION

For the reasons outlined above, the Commission should afford telephones complying with TIA-631, or a similar standard, the same degree of protection from blanketing interference as devices that currently are not excluded from protection under the Commission's rules. Telephones that do not comply with TIA-631 should be afforded a lesser degree of protection that requires broadcasters to provide readily available technical information to users about resolving telephone interference. In addition, the Commission should continue to rely on telephone manufacturers voluntarily adopting TIA-631, or a similar standard, to reduce telephone interference.

Respectfully submitted,

Lucent Technologies Inc.

A handwritten signature in dark ink, appearing to read "Mary McManus", is written over a horizontal line.

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